

# EXHIBIT 4

1                   IN THE UNITED STATE DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3                   MEGAN FOX & BRIDGET               :  
4                   MCMAHON, ON BEHALF OF           :  
5                   THEMSELVES AND ALL OTHERS  
6                   SIMILARLY SITUATED               :

7                   Plaintiffs                        :  
8    :  
9    :

10                  vs.                                :  
11   :  
12   :

13                  CHIPOTLE MEXICAN GRILL, :  
14                  INC., d/b/a CHIPOTLE       : NO.  
15                  Defendant                   : 2:20-CV-01448-WSS

16   - - -  
17   Wednesday, September 29, 2021  
18   - - -

19   Oral Deposition of BRIDGET  
20                  MCMAHON, taken remotely pursuant to notice,  
21                  held at 310 Grant Street, Pittsburgh,  
22                  Pennsylvania commencing at 9:30 a.m., and  
23                  reported stenographically by Janice L. Welsh,  
24                  Court Reporter, Notary Public in and for the  
25                  Commonwealth of Pennsylvania.

\* \* \*

<p style="text-align: right;">Page 18</p> <p>1 A Yes.</p> <p>2 Q And that is your lawyer's daughter?</p> <p>3 A Yes.</p> <p>4 Q Tell me what Isabella asked you about.</p> <p>5 A She asked me if I had experienced the</p> <p>6 same thing.</p> <p>7 Q Tell me everything you remember about</p> <p>8 that conversation with Isabella, please.</p> <p>9 A I remember this happening to Megan, and</p> <p>10 then it happening to me as well, and then</p> <p>11 speaking to our friend, Isabella, about it she</p> <p>12 had mentioned again, and I knew, that her</p> <p>13 father was a lawyer, and that I could speak to</p> <p>14 her father about it.</p> <p>15 Q So, did you talk to Isabella about it</p> <p>16 before or after you talked about it with</p> <p>17 Megan?</p> <p>18 A At the same time.</p> <p>19 Q Were the three of you together for the</p> <p>20 conversation?</p> <p>21 A Yes.</p> <p>22 Q Where were you during that conversation?</p> <p>23 A I don't remember.</p> <p>24 Q Was it an in-person conversation?</p> <p>25 A Some.</p>	<p style="text-align: right;">Page 20</p> <p>1 issue along with Megan?</p> <p>2 A Including.</p> <p>3 Q So, to your knowledge, Isabella had not</p> <p>4 experienced that issue while at Chipotle,</p> <p>5 correct?</p> <p>6 A No. Not to my knowledge.</p> <p>7 Q I'm done with that exhibit for now. So,</p> <p>8 I'll take that down.</p> <p>9 Did you assist your lawyer in</p> <p>10 gathering any documents to produce in this</p> <p>11 case?</p> <p>12 A No. I'm sorry, yes.</p> <p>13 Q Can you tell me what you did to look for</p> <p>14 documents that are relevant to this case?</p> <p>15 A I provided my receipt, as well a picture</p> <p>16 of the cash that I received.</p> <p>17 Q Did you do anything else besides taking</p> <p>18 that picture and providing a picture of the</p> <p>19 cash?</p> <p>20 A I don't think so.</p> <p>21 Q Did you search your emails for any</p> <p>22 communications that might be relevant to this</p> <p>23 issue?</p> <p>24 A No.</p> <p>25 Q Other than taking a picture of your</p>
<p style="text-align: right;">Page 19</p> <p>1 Q The first time you all spoke about it,</p> <p>2 was it an in-person conversation?</p> <p>3 A I don't remember.</p> <p>4 Q When you say some, are you saying that</p> <p>5 you did speak about it in person, and then</p> <p>6 also either electronically, whether phone,</p> <p>7 text, or other means; is that right?</p> <p>8 A Yes.</p> <p>9 Q Did you have text messages about the</p> <p>10 issue?</p> <p>11 A Prior to the Complaint, yes.</p> <p>12 Q So, you had some text messages about the</p> <p>13 issue prior to getting a lawyer to represent</p> <p>14 you in the case?</p> <p>15 A Yes.</p> <p>16 Q And those text messages were to and from</p> <p>17 Megan Fox and to and from Isabella Salpietro?</p> <p>18 A Yes.</p> <p>19 Q Did you look for and provide those text</p> <p>20 messages to your lawyer in this case?</p> <p>21 A No.</p> <p>22 Q You mentioned you talked about the issue</p> <p>23 with Isabella. Did Isabella say the same</p> <p>24 thing happened to her, or were you just</p> <p>25 including her in your conversation about the</p>	<p style="text-align: right;">Page 21</p> <p>1 receipt, and the cash, did you look for any</p> <p>2 hard copy documents that might be relevant to</p> <p>3 your claims in this case?</p> <p>4 A I don't think so.</p> <p>5 Q The photo of the receipt and the cash --</p> <p>6 let me actually pull it up. I'll enter it as</p> <p>7 an exhibit. Let me know when you can see this</p> <p>8 document.</p> <p>9 - - -</p> <p>10 (Whereupon the document was</p> <p>11 marked, for identification purposes, as</p> <p>12 Exhibit-2.)</p> <p>13 - - -</p> <p>14 THE WITNESS: I can see it.</p> <p>15 BY MS. TURNER:</p> <p>16 Q I'll represent to you that Exhibit-2 is</p> <p>17 Plaintiff's Objections and Responses to the</p> <p>18 First Request for Production of Documents that</p> <p>19 Chipotle served. Did you receive or review</p> <p>20 these responses to Chipotle at any time?</p> <p>21 A Yes.</p> <p>22 Q I'm going to go to your verification.</p> <p>23 You see there is another verification here,</p> <p>24 and it has your signature on it dated June</p> <p>25 30th, 2021. Again, you're verifying that the</p>

<p style="text-align: right;">Page 22</p> <p>1 responses are true and correct to the best of 2 your knowledge, information and belief. Did 3 you review those responses and provide that 4 verification? 5 A Yes. 6 Q On the screen I'm showing you what is 7 page 15 of Exhibit-2. It's marked as 8 Fox/McMahon-1. In the lawyer world we call 9 that a Bates number. So, plaintiff's Bates 10 number one. Is that a copy of the picture you 11 took to show your receipt and the change you 12 received at Chipotle? 13 A Yes. 14 Q Do you have a better copy of this? You 15 can see that it's a little blurry. Do you 16 have a better copy? 17 A No. 18 Q Can you read the text on this receipt in 19 this photo? 20 A Some. 21 Q Let me see if I can zoom in here and 22 allow you to still read it. Obviously, I can 23 read Chipotle Mexican Grill. Can you read 24 that next line under it? 25 A I cannot.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q Then under that I see what I think is 2 subtotal, and it has a number there. Can you 3 read that? 4 A The number there I see is 14. 5 Q And there are some other numbers in the 6 form of change under that. Can you read the 7 bottom four lines here? 8 A I see take out total. I cannot read 9 under that. And I see cash and change. 10 Q How much was the total here? Can you 11 read that? 12 A \$15.51. 13 Q And the cash says \$20.00? 14 A Yes. 15 Q And the change says \$4.49? 16 A Yes. 17 Q Can you read the text at the bottom of 18 the receipt? It looks like it's five or six 19 lines. Can you read that? 20 A No. 21 Q I think you testified to this, but I 22 want to make sure. Other than this photo did 23 you provide any other documents, whether 24 electronic, hard copy, whatsoever to your 25 attorney in connection with this matter?</p>
<p style="text-align: right;">Page 23</p> <p>1 Q It looks like under that is an address. 2 I see Allison Park, PA. Other than that can 3 you read it? 4 A The street name is William Flynn 5 Highway. 6 Q Can you read that number that is right 7 below the address? 8 A No. 9 Q Can you read the next three lines? 10 A I see the host's name is Zachary. I 11 cannot read the other two. 12 Q And then the next two lines I'm circling 13 with my mouse, can you read those lines? 14 A Chicken bowl, veggie bowl. 15 Q And then under that, can you read those 16 lines? 17 A I can read reward points are on the way, 18 and then I cannot read after that. 19 Q Under that there's another little block 20 of text. Can you read that part? 21 A I can only read free Chipotle for a 22 year. 23 Q Under that there are two lines. Can you 24 read the text under those two lines? 25 A I see complete rules visit our website.</p>	<p style="text-align: right;">Page 25</p> <p>1 A Not that I can remember. 2 Q Other than the name you stated at the 3 beginning of this deposition, have you ever 4 been known by any other names? 5 A No. 6 Q You're fairly young. So, I assume 7 you're not married? 8 A No. 9 Q I'm going to admit one other exhibit 10 here. These are your interrogatory 11 responses. This is just to make this go a 12 little more quickly, since you provided some 13 of this information to us already. 14 - - - 15 (Whereupon the document was 16 marked, for identification purposes, as 17 Exhibit-3.) 18 - - - 19 BY MS. TURNER: 20 Q I have marked Exhibit-3. This is your 21 Objections and Responses to The First Set of 22 Interrogatories to you. Do you recall 23 receiving a draft of this and reviewing it to 24 make sure it was correct? 25 A Yes.</p>

Page 42	Page 44
<p>1 Q You can answer.</p> <p>2 A Well, knowing that Isabella's father was</p> <p>3 a lawyer, and after we had the same claims, I</p> <p>4 think it was just a given.</p> <p>5 Q So, it's your testimony that it was</p> <p>6 Isabella's idea to talk to her dad about</p> <p>7 potential claims against Chipotle?</p> <p>8 MR. SALPIETRO: Objection to the</p> <p>9 form.</p> <p>10 THE WITNESS: Sure.</p> <p>11 BY MS. TURNER:</p> <p>12 Q You have been friends with Isabella</p> <p>13 Salpietro for a long time, right?</p> <p>14 A Yes.</p> <p>15 Q How long have you been friends with her?</p> <p>16 A I believe since 2012.</p> <p>17 Q Do you recall what grade you were in</p> <p>18 when you met her and became friends?</p> <p>19 A 9th grade.</p> <p>20 Q What about Megan Fox, how long have you</p> <p>21 been friends with her?</p> <p>22 A The same.</p> <p>23 Q Are you still close friends today?</p> <p>24 A Yes.</p> <p>25 Q Are you family friends with the</p>	<p>1 the Pittsburgh area from South Carolina?</p> <p>2 A Yes.</p> <p>3 Q Did Isabella tell you that her father</p> <p>4 was a class action lawyer?</p> <p>5 A Yes.</p> <p>6 Q Did she tell you that he could help you</p> <p>7 obtain a monetary recovery if you decided to</p> <p>8 sue Chipotle?</p> <p>9 A No.</p> <p>10 Q Did you ever talk to your parents about</p> <p>11 filing the lawsuit against Chipotle before you</p> <p>12 decided to hire Mr. Salpietro?</p> <p>13 A Yes.</p> <p>14 Q What did you say to your parents? What</p> <p>15 was the discussion with your parents?</p> <p>16 A The discussion was my claim.</p> <p>17 Q What did you tell them about what</p> <p>18 happened?</p> <p>19 A I told them exactly what happened at</p> <p>20 Chipotle.</p> <p>21 Q Did you tell them that you were going to</p> <p>22 hire a lawyer?</p> <p>23 A I told them that I had thought about it.</p> <p>24 Q What was their response to that?</p> <p>25 A Okay.</p>
Page 43	Page 45
<p>1 Salpietro family?</p> <p>2 A No.</p> <p>3 Q Do your parents ever hang out with Mr.</p> <p>4 or Mrs. Salpietro, or whatever the family is</p> <p>5 at the Salpietro home?</p> <p>6 A No.</p> <p>7 Q Shortly before the August 2020</p> <p>8 transaction at issue, you were on vacation</p> <p>9 with Isabella Salpietro in South Carolina; is</p> <p>10 that right?</p> <p>11 A Yes.</p> <p>12 Q Who was on that trip with you and</p> <p>13 Isabella?</p> <p>14 A Megan Fox and Carley Martin.</p> <p>15 Q How long were you there?</p> <p>16 A I don't remember.</p> <p>17 Q Was it more than a week?</p> <p>18 A No.</p> <p>19 Q Was it just for vacation for fun?</p> <p>20 A Yes.</p> <p>21 Q During that trip did you talk about</p> <p>22 anything relating to Chipotle, or correct</p> <p>23 change, or the coin shortage?</p> <p>24 A No.</p> <p>25 Q All of that arose after you got back to</p>	<p>1 Q They didn't have any opinions on you</p> <p>2 hiring a lawyer for this, one way or the</p> <p>3 other?</p> <p>4 A They knew my claim.</p> <p>5 Q Did they have any opinions on you hiring</p> <p>6 a lawyer for your claims in this case?</p> <p>7 A Yes.</p> <p>8 Q What were their opinions that they told</p> <p>9 you?</p> <p>10 A They supported me.</p> <p>11 Q Did they think it was a good idea?</p> <p>12 MR. SALPIETRO: Objection to the</p> <p>13 form. You can answer, if you know.</p> <p>14 THE WITNESS: I don't know.</p> <p>15 BY MS. TURNER:</p> <p>16 Q Did Isabella ever talk to you about a</p> <p>17 potential lawsuit involving the change</p> <p>18 shortage, or getting correct change at</p> <p>19 Chipotle, before you arrived at Chipotle on</p> <p>20 August 18th?</p> <p>21 A I don't remember.</p> <p>22 Q She could have, but you can't remember</p> <p>23 one way or the other?</p> <p>24 A We had spoken about what happened to Ms.</p> <p>25 Fox.</p>

Page 46

1 Q That was before you went to Chipotle on  
2 the 18th?  
3 A Yes.  
4 Q Did Ms. Fox or Isabella tell you about  
5 what happened to Megan Fox at Chipotle?  
6 A Megan.  
7 Q Then at some point you said you had  
8 spoken to Isabella about it. How did Isabella  
9 find out about what happened to Megan at  
10 Chipotle, if you know?  
11 A The three of us had spoken about it.  
12 Q So, when you went into Chipotle on  
13 August 18th, and paid in cash, you were aware  
14 of what Megan Fox had told you about her  
15 transaction?  
16 A Yes.  
17 Q And you were trying to see what would  
18 happen if you tried to pay with cash at  
19 Chipotle to see if the same thing would happen  
20 to you?  
21 A Yes.  
22 Q You were testing to see if the same  
23 issue that occurred with Ms. Fox would happen  
24 to you during your transaction; is that right?  
25 A Yes.

Page 47

1 Q If you weren't trying to test what would  
2 happen in a cash transaction, you wouldn't  
3 have paid in cash; is that right?  
4 MR. SALPIETRO: Objection to the  
5 form.  
6 THE WITNESS: I'm not  
7 sure.  
8 BY MS. TURNER:  
9 Q Other than the transaction on August  
10 18th, have you ever paid in cash for food at  
11 Chipotle before?  
12 A I believe so.  
13 Q Do you remember how many times other  
14 than August 18th you ever paid for anything in  
15 cash at Chipotle?  
16 A I don't remember.  
17 Q Do you think it was more than once?  
18 A I don't remember.  
19 Q You have no idea whether it was one time  
20 or ten times?  
21 A No.  
22 Q I'm going to enter another exhibit in  
23 just a second. I'm looking for it. Before I  
24 get to the exhibit, do you have a fee  
25 agreement with your lawyer where you have to

Page 48

1 pay any of the fees and expenses in this  
2 case?  
3 MR. SALPIETRO: Objection. I'll  
4 instruct the witness not to answer any  
5 questions regarding a fee arrangement as set  
6 forth in our responses and objections to the  
7 interrogatories and the cases cited therein.  
8 MS. TURNER: I'm going to ask a  
9 few more questions. I understand your  
10 position.  
11 BY MS. TURNER:  
12 Q Have you had to pay any money  
13 out-of-pocket to prosecute this lawsuit, Ms.  
14 McMahon?  
15 A No.  
16 Q Is it your understanding that you will  
17 ever have to pay any money out-of-pocket to  
18 prosecute this lawsuit?  
19 MR. SALPIETRO: Objection to the  
20 form.  
21 BY MS. TURNER:  
22 Q You can answer.  
23 A No.  
24 Q Do you know anything about what type of  
25 damages you're seeking in this lawsuit?

Page 49

1 MR. SALPIETRO: Objection to the  
2 form.  
3 BY MS. TURNER:  
4 Q You can answer.  
5 A I'm not sure.  
6 Q You said you're not sure. Just one more  
7 question to make sure I fully understand. You  
8 don't know one way or the other what types of  
9 damages or remedies your counsel is seeking in  
10 this lawsuit?  
11 A I don't know.  
12 Q When you say you don't know, is it that  
13 you're not sure whether you know, or do you  
14 know anything about the remedies or damages  
15 that your counsel is seeking in this lawsuit?  
16 MR. SALPIETRO: I'll object to  
17 the form, calls for legal conclusion.  
18 BY MS. TURNER:  
19 Q You can answer.  
20 A I'm not sure if I know.  
21 Q It's possible you know?  
22 A Yes.  
23 Q Is there anything that would help  
24 refresh your recollection about the damages or  
25 remedies that your counsel is seeking in this